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May 26, 2020

BY ELECTRONIC DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington D.C. 20554

Re: Permitted Oral *Ex Parte* Notice
Wireless E911 Location Accuracy Requirements
PS Docket No. 07-114

Dear Ms. Dortch:

On May 22, 2020, representatives of NextNav, LLC ("NextNav") participated in a conference call with Zenji Nakazawa, Public Safety and Consumer Protection Advisor to Chairman Ajit Pai. On May 21, 2020, the same NextNav representatives participated in a conference call with the staff of the Public Safety and Homeland Security Bureau ("PSHSB"). Participating in the call on behalf of the PSHSB were David Furth, Dr. Rasoul Safavian, John Evanoff, Brenda Boykin, along with Melissa Conway of the Wireless Telecommunications Bureau. Participating in the call on behalf of NextNav were Ganesh Pattabiraman, CEO and Co-Founder; Gary Parsons, Executive Chairman; Bruce Cox, Senior Director, Regulatory & Public Safety; and the undersigned.

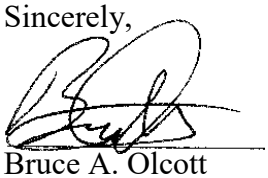
The NextNav representatives highlighted their continued progress despite the pandemic in constructing NextNav's vertical location network. As AT&T Services, Inc. and NextNav jointly indicated in their May 8 letter to the Commission, NextNav's vertical location network will be available for use in 105 cellular market areas ("CMAs") well in advance of the April 2021 deadline for the provision of 3 meter accurate vertical location information to support public safety in the largest 25 CMAs. NextNav's network coverage, when integrated with terrain database information for areas lacking large, multi-story structures, will make NextNav's highly accurate z-axis service available to more than 90 percent of the U.S. population before the April 2021 milestone. The Commission is therefore on course to achieve comprehensive nationwide coverage for vertical location accuracy to support E911 emergency services, while concurrently maintaining the critical mandate of 3 meter accuracy for 80 percent of calls that the public safety community has repeatedly indicated is required to enhance public safety.

The parties also discussed NextNav's proven capability to employ software to remotely calibrate barometric pressure sensors in handsets on a periodic and background basis to ensure consistent performance between disparate sensors and handset manufacturers. NextNav worked closely with its carrier partners to design its sensor calibration process so that it does not involve any user location tracking or other privacy concerns that have been identified by the Commission and public interest groups. Depending on the underlying quality of the sensor and the handset manufacturing process, NextNav's background sensor calibration is not a real time process and occurs only once every few days for each handset. Thus, it will have a *de minimis* impact on handset battery and data consumption.

Some handset manufacturers are already incorporating NextNav's royalty-free calibration software in upcoming handset models. The inclusion of NextNav's software in the handset build provides the added benefit to manufacturers of reducing the time, cost and complexity of calibrating the sensor during the manufacturing process.

Thank you for your attention to these matters. Please contact the undersigned if you have any questions.

Sincerely,



Bruce A. Olcott